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June 27, 2025

**VIA ECF**

Magistrate Judge Victoria Reznik  
United States District Court  
Southern District of New York  
300 Quarropas Street, Courtroom 420  
White Plains, NY 10601-4150

Re: *The Wave Studio, LLC v. General Hotel Management, Ltd., et al.*, Case No. 7:13-cv-09239-CS

Dear Judge Reznik:

This firm represents Orbitz Worldwide LLC (“Orbitz”) in this action.<sup>1</sup> We submit this letter in response to the Plaintiff, Wave Studios LLC’s June 18, 2025 letter to the Court regarding the procedural history of the litigation and the purported purpose of the Master Complaint filed on January 26, 2024. ECF 528.

Orbitz disagrees with Plaintiff’s characterization of the Master Complaint’s function in this action, and adopts the positions set forth in the June 27, 2025 letter to the Court filed by Harvey R. Herman on behalf of VFM Leonardo, Inc. et al. ECF 546.

Orbitz remains open to a resolution of Plaintiff’s claims, and to that end further endorses the setting of a Status Conference following the disposition of the pending motions to dismiss.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ James Rosenfeld  
James Rosenfeld

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<sup>1</sup> Regina Shaffer-Goldman is currently counsel of record for Orbitz in this action, but Ms. Schaffer-Goldman is no longer practicing at Morgan, Lewis & Bockius LLP or representing Orbitz. We will be filing a motion to substitute James Rosenfeld and Celyra Myers of Davis Wright Tremaine LLP as counsel of record for Orbitz in her stead.

Davis Wright previously appeared as counsel for multiple other defendants in this action. It no longer represents those defendants because other counsel has substituted for it pursuant to indemnification agreements between the parties, or because they have not been named as defendants in the Master Complaint.